

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	
vs.)	No. 08 CR 38
)	
ANTHONY QUIRIN,)	HON. RUBEN CASTILLO,
)	JUDGE PRESIDING.
DEFENDANT.)	

**MOTION TO REQUIRE NOTICE OF INTENTION TO
USE OTHER CRIMES, WRONGS, OR ACTS EVIDENCE**

NOW COMES THE DEFENDANT, ANTHONY QUIRIN, by and through his attorney, William K. Hedrick, and pursuant to Rule 12(d) (2), Federal Rules of Criminal Procedure, and Rule 104(a) and (c), Federal Rules of Evidence, moves for an order requiring the government to give notice of its intention to use at the trial of the instant matter, either in its direct case, during the cross-examination of a Defendant or in its rebuttal case, the following:

1. Evidence of "other crimes, wrongs or acts" of any Defendant as that phrase is used in Fed. R. Evid. 404(b).
 - (a) In regard to said notice, the government should identify and describe:
 - i. The dates, times, places and persons involved in said other crimes, wrongs or acts;
 - ii. The statements of each participant in said other crimes, wrongs, or acts;
 - iii. The documents which contain or evidence said other crimes, wrongs or acts, including when the documents were prepared, who prepared the documents and who prepared the documents and who has possession of the documents; and

- iv. The issue or issues on which the government believes such other crimes, wrongs or acts evidence is relevant within Fed. R. Evid. 404(b).
- 2. Evidence of "specific instances of conduct" of any Defendant as that phrase is used in Fed. R. Evid. 608(b).
 - i. The dates times, places and persons involved in said specific acts of misconduct;
 - ii. The statements of each participant in said specific acts of misconduct; and
 - iii. The documents which contain or evidence said specific acts of misconduct, including when the documents were prepared, who prepared the documents, and who prepared the documents and who has possession of the documents; and

Respectfully Submitted,

WILLIAM K. HEDRICK
Attorney for Defendant

Prepared by:

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